

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of  
Proposal for Creation of the Low Power FM  
(LPFM) Broadcast Service

FCC RM-9242

To: Federal Communications Commission  
Reply—Comments of James J. Henderson

I have read and studied comments filed by parties opposing creation of a LPFM broadcast service, as proposed in RM-9242. These parties include: the National Association of Broadcasters (NAB), USA Digital Radio the American Community of AM Broadcasters (ACAMBA) and a joint statement from several State Broadcasting Associations.

In good conscience I cannot agree with their arguments and reasoning. It appears to me that all of these parties are offering weak excuses to thwart the much needed community service of LPFM. It is obvious these parties do not want LPFM to ever see the light of day. Their arguments are highly suspect.

One of the main arguments of the NAB is that LPFM would be "inefficient use of spectrum." They say higher-power stations cover a larger area. True—but *not a reason to deny* this important and much need local community service. It is the very reason that NAB gives — *big stations covering big areas* — that supports the fact that stations covering large areas cannot *devote the time, attention and financial resources to serve small communities!*

LPFM means the greatest diversity of voices, and in this area RM-9242 wins hands down!

USA Digital Radio argue that deletion of the 2nd adjacent channel restrictions would create interference to proposed digital stations in the future. Not so. Their digital plans call for adhering to the emission limitations and protection contours in place for existing analog broadcasting. If LPFM would cause small areas of interference, as they claim, then hundreds of existing full-power short-spaced grandfathered FM stations, operating on 2nd adjacent channels would cause much larger areas of interference. Any areas of interference would be centered around the LPFM transmitting site and would be a smaller area than full-power FM stations "blanketing" area, which blocks reception of other stations.

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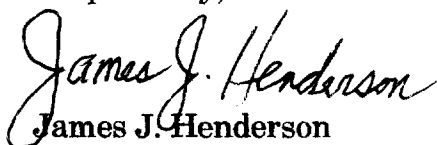
The enormous positive benefits of creating thousands of new "locally owned" LPFM stations would far outweigh any concerns over minimal areas of interference.

Another reason RM-9242 makes sense: there are small rural communities where the majority of the residents live in a 15 mile radius. Under this plan, the power of the station would be somewhat flexible to allow for enough wattage to get the job done. **One-watt radio will not cover the 15 miles that make up the uniqueness of our community population. Even FM translators can have 250 watts!**

Our community has *no radio service*. No local news. We are in an area that was hit hard by winter storms and we do not get the news and information critical to our small local population! As a small community we receive no service from those high-powered stations that want to maintain the status-quo. And the status-quo for us means no service. We have a weekly newspaper. We need more. We need LPFM to service the needs of our local community.

RM-9242 is the best LPFM proposal I have seen. Please don't let the NAB and other money interests prevail in keeping a diversity of voices from serving the needs of the people.

Respectfully,



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**Certificate of Service**

I, James J. Henderson, do hereby certify that a true and correct copy of the foregoing "Reply-Comments on RM-9242" was sent via first class mail, this 12th day of May, 1998 to the following parties:

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